

Exhibit A

Proposed Order

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO

In re:

THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

THE COMMONWEALTH OF PUERTO RICO, *et al.*,
Debtors.¹

PROMESA

Title III

No. 17 BK 3283-LTS

(Jointly Administered)

This filing relates to the
Commonwealth and ERS.

ORDER GRANTING FIVE HUNDRED FORTY-FIRST OMNIBUS OBJECTION
(SUBSTANTIVE) OF THE COMMONWEALTH OF PUERTO RICO AND THE
EMPLOYEES RETIREMENT SYSTEM OF THE GOVERNMENT OF THE
COMMONWEALTH OF PUERTO RICO TO CLAIMS FOR WHICH THE OBJECTING
DEBTORS ARE NOT LIABLE

Upon the *Five Hundred Forty-First Omnibus Objection (Substantive) of the Commonwealth of Puerto Rico and the Employees Retirement System of the Commonwealth of Puerto Rico to Claims for which the Objecting Debtors are Not Liable* (the “Five Hundred Forty-First Omnibus Objection”),² filed by the Commonwealth of Puerto Rico (the “Commonwealth”), the Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS,” and with the Commonwealth, the “Objecting Debtors”), dated October 28, 2022, for entry

¹ The Debtors in these Title III Cases, along with each Debtor’s respective Title III case number and the last four (4) digits of each Debtor’s federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (the “Commonwealth”) (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation (“COFINA”) (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority (“HTA”) (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS”) (Bankruptcy Case No. 17 BK 3566-LTS) (Last Four Digits of Federal Tax ID: 9686); (v) Puerto Rico Electric Power Authority (“PREPA”) (Bankruptcy Case No. 17 BK 4780-LTS) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority (“PBA”, and together with the Commonwealth, COFINA, HTA, ERS, and PREPA, the “Debtors”) (Bankruptcy Case No. 19-BK-5523-LTS) (Last Four Digits of Federal Tax ID: 3801) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

² Capitalized terms used but not defined herein shall have the meanings ascribed to them in the Five Hundred Forty-First Omnibus Objection.

of an order disallowing in their entirety certain claims filed against the Objecting Debtors, as more fully set forth in the Five Hundred Forty-First Omnibus Objection and supporting exhibits thereto; and the Court having jurisdiction to consider the Five Hundred Forty-First Omnibus Objection and to grant the relief requested therein pursuant to PROMESA section 306(a); and venue being proper pursuant to PROMESA section 307(a); and due and proper notice of the Five Hundred Forty-First Omnibus Objection having been provided to those parties identified therein, and no other or further notice being required; and the claims identified in the column titled “Claims to be Disallowed” in Exhibit A to the Five Hundred Forty-First Omnibus Objection (collectively, the “Claims to Be Disallowed”) having been found to be claims for which the Commonwealth and/or ERS are not liable; and the Court having determined that the relief sought in the Five Hundred Forty-First Omnibus Objection is in the best interest of the Objecting Debtors, their creditors, and all the parties in interest; and the Court having determined that the legal and factual bases set forth in the Five Hundred Forty-First Omnibus Objection establish just cause for the relief granted herein; and after due deliberation and sufficient cause appearing therefor, it is

ORDERED that the Five Hundred Forty-First Omnibus Objection is GRANTED as set forth herein; and it is further

ORDERED that the Claims to Be Disallowed are hereby disallowed in their entirety; and it is further

ORDERED that Kroll is authorized and directed to designate the Claims to Be Disallowed as expunged on the official claims registry in the Title III Cases; and it is further

ORDERED that this Order resolves Docket Entry No. 22745 in Case No. 17-3283; and it is further

ORDERED that this Court shall retain jurisdiction to hear and determine all matters arising from or related to the implementation, interpretation, or enforcement of this Order.

SO ORDERED.

Dated: _____

Honorable Judge Laura Taylor Swain
United States District Judge

EXHIBIT A

Schedule of Claims Subject to the Five Hundred Forty-First Omnibus Objection

Five Hundred Forty-First Omnibus Objection
Exhibit A - Claims to Be Disallowed

	NAME	DATE FILED	CASE NUMBER	DEBTOR	CLAIM #	ASSERTED CLAIM AMOUNT
1	ANDRES VELEZ MUNIZ AND CONCEPCION PARADIS RIVERA 1702 CALLE SAN MATEO SANTURCE SAN JUAN, PR 00912	06/27/2018	17 BK 03283-LTS	Commonwealth of Puerto Rico	164525	\$9,794.10
Reason: The claimant was awarded \$18,000 according to the stipulation agreement presented on 06/27/2014 in relation to case KDP-2012-1489. According to the Cosignment Motion dated 11/01/2016, \$976.80 of the awarded amount was used to offset debts owed to the Department of Treasury. An additional 8,817.30 was offset against debts owed to the Municipal Revenue Collections Center (CRIM), which leaves a remaining amount of \$8,205.90 owed to the claimant. The payment in this amount was issued to the claimant with check number 0085654 on 11/1/2016. As such, there remains no existing liability to the Commonwealth of Puerto Rico.						
2	ANNA MARIA FINETTO BOLTZI, HERMINIO MARTINEZ TIVEDE P.O. BOX 50198 TOA BAJA, PR 00950	05/29/2018	17 BK 03283-LTS	Commonwealth of Puerto Rico	41389	\$16,666.66*
Reason: Proof of claim purports to assert liability based on case number KDP-2009-1505, but the case has since been dismissed as it relates to the Commonwealth of Puerto Rico and the Puerto Rico Highways and Transportation Authority. As such, there is no further basis for liability.						
3	CARRIÓN LOZANO, DAPHNE I PO BOX 1589 CAROLINA, PR 00984	05/23/2018	17 BK 03283-LTS	Commonwealth of Puerto Rico	18890	\$100,000.00*
Reason: Proof of claim purports to assert liability on the basis of case number FDP-2010-1066 but the case has since been dismissed and there is no further basis for liability.						

Five Hundred Forty-First Omnibus Objection
Exhibit A - Claims to Be Disallowed

	NAME	DATE FILED	CASE NUMBER	DEBTOR	CLAIM #	ASSERTED CLAIM AMOUNT
4	COMMUNICATION LEASING LEASING CORPORATION ATTN: ANA ALBERTORIO PO BOX 362526 SAN JUAN, PR 00936-2565	05/29/2018	17 BK 03283-LTS	Commonwealth of Puerto Rico	30353	\$28,214.00
Reason: Invoice(s) totaling \$9,628.48 were paid via checks 00248972, 00285039, 00292432, 00296082, 00296289, 00296893, 00297294, 00004079, 00009588, 00010143, 00010234, 00011682, 00012162, 00012197, 00013237, 00013340, 00013454, 00013765, 00014035, 00014886, 00015014, 00015391, 00015400, 00015621, 00015638, 00015778, 00015792, 00015927, 00016213, 00016437, 00016618, 00017143, 00017287, 00017724, 00018036, 00018280, 00019242, 00019693, 00019772, 00019910, 00020141, 00020299, 00020438, 00020938, 00021170, 00021250, 00021290, 00021929, and 00028034 on 05/04/2012, 04/14/2014, 08/26/2014, 11/18/2014, 12/01/2014, 12/29/2014, 01/26/2015, 08/04/2016, 01/30/2017, 02/10/2017, 02/14/2017, 04/03/2017, 04/17/2017, 04/18/2017, 05/19/2017, 05/23/2017, 05/25/2017, 06/05/2017, 06/12/2017, 07/ 11/2017, 07/13/2017, 07/21/2017, 07/21/2017, 07/31/2017, 07/31/2017, 08/08/2017, 08/08/2017, 08/16/2017, 08/22/2017, 08/30/2017, 09/14/2017, 10/25/2017, 10/30/2017, 11/16/2017, 12/08/2017, 12/19/2017, 01/30/2018, 02/21/2018, 02/22/2018, 03/01/2018, 03/12/2018, 03/16/2018, 03/20/2018, 04/09/2018, 04/12/2018, 04/13/2018, 04/16/2018, 05/04/2018, and 11/09/2018. Additionally, invoice(s) totaling \$1,773.00 fail to provide a basis for asserting a claim against Commonwealth of Puerto Rico. Proof of Claim and supporting documentation only show liability between Claimant and Municipality of Bayamon, which is not part of the Title III proceedings. Further, Proof of Claim purports to assert liabilities associated with the Commonwealth of Puerto Rico, but liabilities totaling \$18,585.52 fail to provide sufficient supporting documentation for asserting the liabilities against the Commonwealth of Puerto Rico, such that the Debtors are unable to determine whether claimant has valid liabilities against the Commonwealth of Puerto Rico or any of the other Title III debtors. Claim #30353 also contained on Exhibit A to the 372nd Omnibus Claims Objection for Claims to Be Modified.						
5	CORRES SOTO, MORAYMA CONDO. PARQUE JULIANA APT0. 103 EDIF. 100 CAROLINA, PR 00987	05/24/2018	17 BK 03566-LTS	Employees Retirement System of the Government of the Commonwealth of Puerto Rico	26257	\$145,008.00*
Reason: Proof of claim purports to assert liability on the basis of case number 2016-10-0546, but the claimant does not appear as a named plaintiff in that litigation. Claim #26257 also contained on Exhibit A to the 337th Omnibus Claims Objection for Claims to Be Reclassified, the 347th Omnibus Claims Objection for Claims to Be Reclassified, and the 547th Omnibus Claims Objection for Claims to Be Disallowed.						
6	CORRES SOTO, MORAYMA CONDO. PARQUE JULIANA EDIF 100 APT0 103 CAROLINA, PR 00987	05/24/2018	17 BK 03283-LTS	Commonwealth of Puerto Rico	44328	\$475,200.00*
Reason: Proof of claim purports to assert liability on the basis of case number 2016-10-0546, but the claimant does not appear as a named plaintiff in that litigation. Claim #44328 also contained on Exhibit A to the 347th Omnibus Claims Objection for Claims to Be Reclassified and the 547th Omnibus Claims Objection for Claims to Be Disallowed.						

Five Hundred Forty-First Omnibus Objection
Exhibit A - Claims to Be Disallowed

	NAME	DATE FILED	CASE NUMBER	DEBTOR	CLAIM #	ASSERTED CLAIM AMOUNT
7	CRUZ CARLO, JOSE M HC 66 BOX 10317 FAJARDO, PR 00738	05/24/2018	17 BK 03283-LTS	Commonwealth of Puerto Rico	28527	\$381,600.00*
Reason: Proof of claim purports to assert liability on the basis of case number 2016-10-0546, but the claimant does not appear as a named plaintiff in that litigation. Claim #28527 also contained on Exhibit A to the 347th Omnibus Claims Objection for Claims to Be Reclassified, the 351st Omnibus Claims Objection for Claims to Be Partially Disallowed, and the 548th Omnibus Claims Objection for Claims to Be Disallowed.						
8	CRUZ CARLO, JOSE M. HC 66 BOX 10317 FAJARDO, PR 00738	05/24/2018	17 BK 03566-LTS	Employees Retirement System of the Government of the Commonwealth of Puerto Rico	31462	\$160,014.96*
Reason: Proof of claim purports to assert liability on the basis of case number 2016-10-0546, but the claimant does not appear as a named plaintiff in that litigation. Claim #31462 also contained on Exhibit A to the 337th Omnibus Claims Objection for Claims to Be Reclassified, the 347th Omnibus Claims Objection for Claims to Be Reclassified, and the 351st Omnibus Claims Objection for Claims to Be Partially Disallowed.						
9	HERNANDEZ RIVERA, RAMON CALLE LAS FLORES #42 VISTA ALEGRE BAYAMON, PR 00959	05/24/2018	17 BK 03283-LTS	Commonwealth of Puerto Rico	29547	\$641.31*
Reason: Proof of claim purports to assert liability on the basis of case number 2016-10-0546, but the claimant does not appear as a named plaintiff in that litigation. Claim #29547 also contained on Exhibit A to the 347th Omnibus Claims Objection for Claims to Be Reclassified.						
10	JOHNSON ROSARIO, EVELYN VILLA CADIZ 424 CALLE OLOT SAN JUAN, PR 00923	05/24/2018	17 BK 03283-LTS	Commonwealth of Puerto Rico	27751	\$400,248.00*
Reason: Proof of claim purports to assert liability on the basis of case number 2016-10-0546, but the claimant does not appear as a named plaintiff in that litigation. Claim #27751 also contained on Exhibit A to the 347th Omnibus Claims Objection for Claims to Be Reclassified, the 547th Omnibus Claims Objection for Claims to Be Disallowed, and the 548th Omnibus Claims Objection for Claims to Be Disallowed.						

Five Hundred Forty-First Omnibus Objection
Exhibit A - Claims to Be Disallowed

	NAME	DATE FILED	CASE NUMBER	DEBTOR	CLAIM #	ASSERTED CLAIM AMOUNT
11	JOHSON ROSARIO, EVELYN J 424 CALLE OLOT VILLA CADIZ SAN JUAN, PR 00923	05/24/2018	17 BK 03566-LTS	Employees Retirement System of the Government of the Commonwealth of Puerto Rico	28524	\$126,578.88*
Reason: Proof of claim purports to assert liability on the basis of case number 2016-10-0546, but the claimant does not appear as a named plaintiff in that litigation. Claim #28524 also contained on Exhibit A to the 337th Omnibus Claims Objection for Claims to Be Reclassified, the 347th Omnibus Claims Objection for Claims to Be Reclassified, and the 547th Omnibus Claims Objection for Claims to Be Disallowed.						
12	LIMERY DONES, ABRAHAM C/ LEILA U-20 URB. LEVITOWN TOA BAJA, PR 00949	05/24/2018	17 BK 03566-LTS	Employees Retirement System of the Government of the Commonwealth of Puerto Rico	25267	\$122,319.72*
Reason: Proof of claim purports to assert liability on the basis of case number 2016-10-0546, but the claimant does not appear as a named plaintiff in that litigation. Claim #25267 also contained on Exhibit A to the 337th Omnibus Claims Objection for Claims to Be Reclassified, the 347th Omnibus Claims Objection for Claims to Be Reclassified, and the 351st Omnibus Claims Objection for Claims to Be Partially Disallowed.						
13	LIMERY DONES, ABRAHAM URB LEVITTOWN U20 CALLE LEILA TOA BAJA, PR 00949	05/24/2018	17 BK 03283-LTS	Commonwealth of Puerto Rico	28721	\$316,800.00*
Reason: Proof of claim purports to assert liability on the basis of case number 2016-10-0546, but the claimant does not appear as a named plaintiff in that litigation. Claim #28721 also contained on Exhibit A to the 347th Omnibus Claims Objection for Claims to Be Reclassified, the 351st Omnibus Claims Objection for Claims to Be Partially Disallowed, and the 547th Omnibus Claims Objection for Claims to Be Disallowed.						
14	MELLENDEZ, SANTIAGO NUNEZ RR-37 BOX 5140 CALLE ROMANY SAN JUAN, PR 00926	05/24/2018	17 BK 03283-LTS	Commonwealth of Puerto Rico	31418	\$491,400.00*
Reason: Proof of claim purports to assert liability on the basis of case number 2016-10-0546, but the claimant does not appear as a named plaintiff in that litigation. Claim #31418 also contained on Exhibit A to the 347th Omnibus Claims Objection for Claims to Be Reclassified and the 351st Omnibus Claims Objection for Claims to Be Partially Disallowed.						

Five Hundred Forty-First Omnibus Objection
Exhibit A - Claims to Be Disallowed

	NAME	DATE FILED	CASE NUMBER	DEBTOR	CLAIM #	ASSERTED CLAIM AMOUNT
15	MONTANEZ JOHNSON, GLENDA J URBOPEN LAND 424 CALLE OLOT SAN JUAN, PR 00923	05/24/2018	17 BK 03283-LTS	Commonwealth of Puerto Rico	29525	\$108,000.00*
Reason: Proof of claim purports to assert liability on the basis of case number 2016-10-0546, but the claimant does not appear as a named plaintiff in that litigation. Claim #29525 also contained on Exhibit A to the 345th Omnibus Claims Objection for Claims to Be Reclassified, the 547th Omnibus Claims Objection for Claims to Be Disallowed, and the 548th Omnibus Claims Objection for Claims to Be Disallowed.						
16	ORTIZ PEREZ, DIANA M. URB RIO HONDO I D 39 CALLE RIO CAONILLAS BAYAMON, PR 00961	05/25/2018	17 BK 03283-LTS	Commonwealth of Puerto Rico	30739	\$12,000.00*
Reason: Proof of claim purports to assert liability on the basis of case number 2018-02-0453, but the case has since been voluntarily withdrawn by the claimant and there is no further basis for liability.						
17	PEREZ PENALOZA, ZHADYA P RR 2 BOX 252 CAROLINA, PR 00987	05/24/2018	17 BK 03566-LTS	Employees Retirement System of the Government of the Commonwealth of Puerto Rico	45764	\$60,179.76*
Reason: Proof of claim purports to assert liability on the basis of case number 2016-10-0546, but the claimant does not appear as a named plaintiff in that litigation. Claim #45764 also contained on Exhibit A to the 337th Omnibus Claims Objection for Claims to Be Reclassified, the 347th Omnibus Claims Objection for Claims to Be Reclassified, and the 351st Omnibus Claims Objection for Claims to Be Partially Disallowed.						
18	PEREZ PENALOZA, ZHADYA P RR 2 BOX 252 CAROLINA, PR 00987	05/24/2018	17 BK 03283-LTS	Commonwealth of Puerto Rico	25578	\$151,200.00*
Reason: Proof of claim purports to assert liability on the basis of case number 2016-10-0546, but the claimant does not appear as a named plaintiff in that litigation. Claim #25578 also contained on Exhibit A to the 347th Omnibus Claims Objection for Claims to Be Reclassified and the 351st Omnibus Claims Objection for Claims to Be Partially Disallowed.						

Five Hundred Forty-First Omnibus Objection
Exhibit A - Claims to Be Disallowed

	NAME	DATE FILED	CASE NUMBER	DEBTOR	CLAIM #	ASSERTED CLAIM AMOUNT
19	RIVERA HERNANDEZ, ZAIDA 4U 17 ALTOS CALLE LAGRUMO LOMAS VERDES BAYAMON, PR 00956	05/25/2018	17 BK 03283-LTS	Commonwealth of Puerto Rico	31346	Undetermined*
Reason: Proof of claim purports to assert liability on the basis of case number 2016-10-0546, but the claimant does not appear as a named plaintiff in that litigation. Claim #31346 also contained on Exhibit A to the 547th Omnibus Claims Objection for Claims to Be Disallowed.						
20	RIVERA LOPEZ, FRANCISCO J 27 CALLE CORREO CAMUY, PR 00627-2342	05/21/2018	17 BK 03283-LTS	Commonwealth of Puerto Rico	13118	\$14,300.00
Reason: Invoice totaling \$13,200.00 was paid via EFTs 198301, 198304, 210614, 210618, 210619, 210620, 210621, 272633, 272634, 272635, 272636, and 272637 on 07/20/2020, 07/20/2020, 09/04/2020, 09/04/2020, 09/04/2020, 09/04/2020, 09/04/2020, 05/17/2021, 05/17/2021, 05/17/2021, 05/17/2021, and 05/17/2021. Per the books and records of the Commonwealth, invoice totaling \$1,100.00 was associated with amounts that were outside of the approved contract, where no contract was in place or where the invoices were never received and therefore are not due and owed by the Commonwealth agency asserted.						
21	RODRIGUEZ CARDI, ENEROLIZA CALLE RAFAEL ALONZO TORRES #1765 SAN JUAN, PR 00921	05/24/2018	17 BK 03566-LTS	Employees Retirement System of the Government of the Commonwealth of Puerto Rico	27607	\$161,191.44*
Reason: Proof of claim purports to assert liability on the basis of case number 2016-10-0546, but the claimant does not appear as a named plaintiff in that litigation. Claim #27607 also contained on Exhibit A to the 337th Omnibus Claims Objection for Claims to Be Reclassified, the 347th Omnibus Claims Objection for Claims to Be Reclassified, and the 351st Omnibus Claims Objection for Claims to Be Partially Disallowed.						
22	RODRIGUEZ CARDI, ENEROLIZA CALLE RAFAEL ALONZO TORRES #1765 SAN JUAN, PR 00921	05/24/2018	17 BK 03283-LTS	Commonwealth of Puerto Rico	31424	\$691,200.00*
Reason: Proof of claim purports to assert liability on the basis of case number 2016-10-0546, but the claimant does not appear as a named plaintiff in that litigation. Claim #31424 also contained on Exhibit A to the 347th Omnibus Claims Objection for Claims to Be Reclassified and the 351st Omnibus Claims Objection for Claims to Be Partially Disallowed.						

Five Hundred Forty-First Omnibus Objection
Exhibit A - Claims to Be Disallowed

					ASSERTED CLAIM AMOUNT
NAME	DATE FILED	CASE NUMBER	DEBTOR	CLAIM #	
23 TRUJILLO PLUMEY, ROSAMAR COND. TIERRA DEL SOL APT 122 HUMACAO, PR 00791	05/24/2018	17 BK 03283-LTS	Commonwealth of Puerto Rico	29473	\$453,600.00*
Reason: Proof of claim purports to assert liability on the basis of case number 2016-10-0546, but the claimant does not appear as a named plaintiff in that litigation. Claim #29473 also contained on Exhibit A to the 347th Omnibus Claims Objection for Claims to Be Reclassified and the 548th Omnibus Claims Objection for Claims to Be Disallowed.					
TOTAL					\$4,426,156.83*